

**EXHIBIT A**

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 4:19-cv-10520-TSH

CHARU DESAI,  
Plaintiff,

v.

UMASS MEMORIAL MEDICAL  
CENTER, INC., et al.,  
Defendants.

**AFFIDAVIT OF DIANA  
LITMANOVICH, M.D.**

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I, Diana Litmanovich, M.D., hereby depose and state as follows:

1. I am a thoracic radiologist employed at Beth Israel Deaconess Medical Center, and I am a faculty member at Harvard Medical School. I have personal knowledge of the facts set forth herein.

2. I am board-certified in diagnostic radiology and have completed a fellowship in thoracic radiology. I have practiced in the specialty of thoracic radiology for over fifteen years.

3. I have never been employed by UMass Memorial Medical Group, Inc., nor have I had any affiliation with the UMass Memorial Health system.

4. In 2017, Max Rosen, M.D., asked me to perform a review of a set of chest CT studies on behalf of UMass Memorial Medical Group, Inc.

5. Dr. Rosen provided me with the CT images for fifty studies, as well as the de-identified reports with the findings made by the reviewing radiologist for each of the fifty studies. Each study was assigned an identification number, and the patient information and identity of the reading radiologist were redacted.

6. Aside from the CT images and de-identified reports, I was not provided with any further documents or information regarding the studies or the radiologists who conducted them.

7. Dr. Rosen did not provide me with the identity of any radiologist who performed any of the reads included in the fifty studies and did not provide me with any information about any radiologist included. He did not tell me the number of radiologists who performed the reads included in the review.

8. Dr. Rosen did not tell me the identity of any radiologist who was the subject of the review or provide me any information about any individual being evaluated by the review.

9. Dr. Rosen requested that I review the images for each CT study and the corresponding reports, and provide my opinion whether I agreed or disagreed with the reading radiologist's interpretation. If I disagreed, I was asked by Dr. Rosen to indicate whether it was a minor or major disagreement and in my opinion whether or not the disagreement would have an impact on patient care.

10. I completed the review and provided my findings to Dr. Rosen in a spreadsheet. A true and correct copy of the spreadsheet I provided to Dr. Rosen is attached as Exhibit A.

11. I performed the review blinded, and at no time in the course of the review did I know the identity or any identifying information about any radiologist whose reads were included in the review. I did not know the age, gender, disability status, race, or national origin of any radiologist whose reads were included in the review.

Signed under pains and penalties of perjury this 11 day of October 2022.



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Diana Litmanovich, M.D.

**EXHIBIT B**

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 4:19-cv-10520-DHH

CHARU DESAI,  
Plaintiff,

v.

UMASS MEMORIAL MEDICAL CENTER,  
INC., et al.,  
Defendants.

**UMASS MEMORIAL  
DEFENDANTS' INITIAL  
DISCLOSURES**

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Pursuant to Fed. R. Civ. P. 26(a)(1) and Local Rule 26.2(a), Defendants, UMass Memorial Medical Center, Inc. ("UMass Memorial"), UMass Memorial Medical Group; Marlborough Hospital; Max Rosen, MD; Darren Brennan, MD; Stephen Tosi, MD; and Karin Dill, MD (collectively, the "UMass Memorial Defendants"), make the following initial disclosures:

**(A) Witnesses**

Individuals who are likely to have discoverable information that the UMass Memorial Defendants may use to support their defenses include the following:

<b>Witnesses</b>	<b>Subject</b>
1. Charu Desai, MD c/o Plaintiff's counsel	All matters set forth in the Complaint, as well as any other information related to her allegations, damages and mitigation of damages, communications with Defendants, and any information related to her employment, job performance, and separation.
2. Max Rosen, MD c/o undersigned counsel	Dr. Desai's job responsibilities, performance, separation, terms and conditions of employment, as well as the operations of the UMass Memorial radiology department.

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|--|--|
| 3. Stephen Tosi, MD<br>c/o undersigned counsel   | General information regarding Dr. Desai, her employment, and separation from employment.   |
| 4. Karen Dill, MD<br>c/o undersigned counsel   | Dr. Desai's job responsibilities, performance, separation, terms and conditions of employment, as well as the operations of the UMass Memorial radiology department. |
| 5. Darren Brennan, MD<br>c/o undersigned counsel   | General information regarding Dr. Desai and her employment, as well as information regarding the UMass Memorial radiology department.                                |
| 6. Kathleen LeBlanc<br>Associate Vice President,<br>Human Resources<br>UMass Memorial Medical Group<br>c/o undersigned counsel   | Dr. Desai's performance, separation, terms and conditions of her employment, as well as UMass Memorial policies and practices.                                       |
| 7. Randa Mowlood<br>Group Practice Administrator<br>Department of Radiology<br>UMass Memorial Medical Center, Inc.<br>c/o undersigned counsel  | Dr. Desai's job responsibilities, performance, separation, terms and conditions of employment, as well as the operations of the UMass Memorial radiology department. |
| 8. Diana Litmanovich, MD<br>Beth Israel Deaconess Medical Center<br>Department of Radiology<br>c/o undersigned counsel   | Conducted blinded independent review of quality of radiology studies by Dr. Desai and other comparator radiologists.   |
| 9. Kimberly Robinson, MD<br>Pulmonary Disease & Critical Care<br>President of Medical Staff<br>Marlborough Hospital<br>c/o undersigned counsel   | Complaints regarding Dr. Desai's quality.  |
| 10. Steven Baccei, MD<br>Vice-Chair of Radiology Quality, Patient Safety, and Process Improvement<br>Section Chief, Musculoskeletal Imaging and Intervention<br>President, UMass Memorial Medical Staff<br>c/o undersigned counsel | Meeting with Dr. Desai to discuss independent quality review.  |

The UMass Memorial Defendants reserve the right to supplement this list.

**(B) Documents**

A description by category of documents, electronically stored information, and tangible things that the UMass Memorial Defendants have in their possession, custody or control and may use to support their defenses, is as follows:

1. Personnel file for Dr. Desai.
2. Departmental file and documents related to Dr. Desai.
3. Medical and leave file and related documents for Dr. Desai.
4. UMass Memorial's equal opportunity and anti-discrimination policies.
5. UMass Memorial's policies related to medical leave.
6. Documents regarding Dr. Desai's behavior and job performance.
7. Documents regarding Dr. Desai's work quality and peer review.
8. Documents regarding Dr. Desai's continuing education and academic and professional work.
9. Documents regarding compensation for Dr. Desai and other chest/thoracic radiologists.
10. Documents regarding the review and standardization of radiologist compensation.
11. Documents regarding the hiring and termination of other or similarly-situated radiologists.
12. Independent review results, data, and reviewed studies for Dr. Desai quality review, and related documents.
13. Department of Radiology policies and practices, including related to academic and administrative time.

The UMass Memorial Defendants reserve the right to supplement this list.

**(C) Damages**

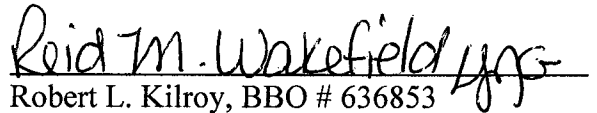
Not applicable.

**(D) Insurance**

Declaration sheets for insurance agreements under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment will be made available for inspection and copying under Rule 34.

**UMASS MEMORIAL MEDICAL  
CENTER, INC.; UMASS MEMORIAL  
MEDICAL GROUP; MARLBOROUGH  
HOSPITAL; MAX ROSEN, MD;  
DARREN BRENNAN, MD; STEPHEN  
TOSI, MD; and KARIN DILL, MD**

By their attorneys,



Robert L. Kilroy, BBO # 636853

Reid M. Wakefield, BBO # 569026

Mirick, O'Connell, DeMallie & Lougee, LLP

1800 West Park Drive, Suite 400

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[rkilroy@mirickoconnell.com](mailto:rkilroy@mirickoconnell.com)

[rwakefield@mirickoconnell.com](mailto:rwakefield@mirickoconnell.com)

Dated: March 13, 2020



CERTIFICATE OF SERVICE

I, Reid M. Wakefield, hereby certify that I have this day served a copy of the foregoing document, by email and by mailing a copy, first class mail, postage prepaid, to Patricia A. Washienko, Esq. and Brian T. Sweeney, Esq. of Frieberger & Washienko, LLC, 211 Congress Street, Suite 720, Boston, MA 02110 and Denise A. Barton, Esq. and Mark A. Johnson, Esq. of University of Massachusetts Medical School, 333 South Street, 4<sup>th</sup> Floor, Shrewsbury, MA 01545.

  
Reid M. Wakefield

Dated: March 13, 2020

**EXHIBIT C**

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

CHARU DESAI,

Plaintiff

v.

UMASS MEMORIAL MEDICAL CENTER,  
INC.; UMASS MEMORIAL MEDICAL  
GROUP; UNIVERSITY OF  
MASSACHUSETTS MEDICAL SCHOOL,  
UMASS MEMORIAL MARLBOROUGH  
HOSPITAL, MAX ROSEN, M.D., DARREN  
BRENNAN, M.D., STEPHEN TOSI, M.D.,  
And KARIN DILL, M.D.,

Defendants

CIVIL ACTION NO.:  
**4:19-CV-10520-DHH**

**PLAINTIFF CHARU DESAI'S ANSWERS TO DEFENDANT UMASS MEMORIAL  
MEDICAL CENTER, INC.'S FIRST SET OF INTERROGATORIES**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff Charu Desai, M.D., ("Plaintiff" or "Dr. Desai"), hereby submits the following answers and objections to Defendant UMass Memorial Medical Center, Inc.'s ("Medical Center") First Set of Interrogatories.

The following responses are made without waiver of, and with preservation of (a) all applicable rights and privileges; (b) all objections as to competency, relevancy, materiality, privilege, and admissibility of each response and the documents referred to therein; (c) the right to object on any grounds at any time to any demand or request or further documents or other discovery proceeding involving or relating thereto; and (d) the right at any time to revise, supplement, amend or clarify any of the responses made herein, whether at the conclusion of the discovery or otherwise.

These answers are based on Plaintiff's present knowledge, information, and belief. Plaintiff reserves the right to supplement, amend or otherwise change these answers in the event that discovery reveals facts that would justify such supplementation, amendment or change. Each Interrogatory is responded to subject to the general objections set forth below.

Plaintiff answers Defendant UMass Memorial's First Set of Interrogatories as follows:

## **INTERROGATORIES**

### **INTERROGATORY NO. 1**

Please identify any person providing assistance or information used in answering these interrogatories or any part thereof.

### **ANSWER NO. 1**

Plaintiff objects to this Interrogatory on the grounds that it seeks information protected by the attorney client privilege / attorney work-product privilege. Subject to and without waiving the above objection, Dr. Desai states that counsel and Dr. Diana Desai assisted in preparing these responses and she verified same.

### **INTERROGATORY NO. 2**

Please identify all persons who have knowledge of any occurrence, event, fact, or circumstance referenced in the Charges and/or the Complaint and/or in any way relevant to this Action, specifying which occurrence, event, fact, or circumstance each such person has knowledge of and, to the extent known, a summary of that knowledge.

### **ANSWER NO. 2**

1. Charu Desai, M.D.  
c/o Freiburger & Washienko, LLC. Plaintiff: has knowledge of the facts relating to her claims and damages.
2. Diana Desai, M.D.  
c/o Freiburger & Washienko, LLC. Dr. Desai's daughter: witness to Dr. Desai's emotional distress.
3. Max Rosen, M.D.  
Medical Center, 55 Lake Avenue North, Worcester, MA 01655, (508) 334-1000. Defendant and current Chairman of the Medical Center's Department of Radiology (the "Department"): likely to have information concerning the gender, age, race, disability, and national origin based disparate treatment targeted at Dr. Desai; the pay disparities in the Department; the "independent review" of Dr. Desai's work; and Dr. Desai's termination.
4. Darren Brennan, M.D.  
Marlborough Hospital, 157 Union St, Marlborough, MA 01752, (508) 481-5000. Defendant and Chief of Radiology at Marlborough: likely to have information concerning the gender, age, race, disability, and national origin based disparate treatment targeted at Dr. Desai; and Dr. Desai's termination.
5. Stephen Tosi, M.D.

Medical Center, 55 Lake Avenue North, Worcester, MA 01655, (508) 334-1000. Defendant and Chief Medical Officer of the Medical Center and President of the Medical Group: likely to have information concerning the gender, age, race, disability, and national origin based disparate treatment targeted at Dr. Desai; and the pay disparities in the Department.

6. Karin Dill, M.D.  
Medical Center, 55 Lake Avenue North, Worcester, MA 01655, (508) 334-1000. Defendant and Division Chief of Chest Radiology at the Medical Center: likely to have information concerning the gender, age, race, disability, and national origin based disparate treatment targeted at Dr. Desai; the pay disparities in the Department; the “independent review” of Dr. Desai’s work; and Dr. Desai’s termination.
7. Joseph Ferrucci, M.D.  
Medical Center, 55 Lake Avenue North, Worcester, MA 01655, (508) 334-1000. Former Chair of the Department: likely to have information concerning Dr. Desai’s performance; the gender, age, race, disability, and national origin based disparate treatment targeted at Dr. Desai; the independent review of Dr. Desai’s work; and Dr. Desai’s termination.
8. Adib Karam, M.D.  
Massachusetts (address unknown). Former Radiologist in the Department: likely to have information concerning the gender, age, race, disability, and national origin based disparate treatment targeted at Dr. Desai; and the pay disparity in the Department.
9. Gopal Vijayaraghanavan, M.D.  
Medical Center, 55 Lake Avenue North, Worcester, MA 01655, (508) 334-1000. Radiologist in the Department: likely to have information concerning the gender, age, race, disability, and national origin based disparate treatment targeted at Dr. Desai; and the pay disparity in the Department.
10. Joseph Makris, M.D.  
Atlanta, Georgia (address unknown). Former Radiologist in the Department: likely to have information concerning the gender, age, race, disability, and national origin based disparate treatment targeted at Dr. Desai; and the pay disparity in the Department.
11. Abhijit Roychowdhury, M.D.  
Fayetteville, North Carolina (address unknown). Former Radiologist in the Department: likely to have information concerning the gender, age, race, disability, and national origin based disparate treatment targeted at Dr. Desai; and the pay disparity in the Department.
12. Padmaja Surapaneni, M.D.  
Massachusetts (address unknown). Former Radiologist in the Department: likely to have information concerning the gender, age, race, disability, and national origin based disparate treatment targeted at Dr. Desai; and the pay disparity in the Department.

13. Steven Baccei, M.D.

Medical Center, 55 Lake Avenue North, Worcester, MA 01655, (508) 334-1000. Vice-Chair of Quality, Patient Safety, and Process Improvement for the Department: likely to have information concerning the independent review of Dr. Desai's work.

14. Sarwat Hussain, M.D.

Medical Center, 55 Lake Avenue North, Worcester, MA 01655, (508) 334-1000. Radiologist in the Department: likely to have information concerning the gender, age, race, disability, and national origin based disparate treatment targeted at Dr. Desai; the pay disparities in the Department; the "independent review" of Dr. Desai's work; and Dr. Desai's termination.

15. Jerry Balikian, M.D.

Massachusetts (address unknown). Former Division Chief of Chest Radiology: likely to have information concerning Dr. Desai's performance.

16. Christopher Cerniglia, M.D.

Medical Center, 55 Lake Avenue North, Worcester, MA 01655, (508) 334-1000. Radiologist in the Department: likely to have information concerning the pay disparity in the Department.

17. Richard Irwin, M.D.

Medical Center, 55 Lake Avenue North, Worcester, MA 01655, (508) 334-1000. Chief of Pulmonology at the Medical Center: likely to have information concerning Dr. Desai's performance.

18. George Eypper, M.D.

Medical Center, 55 Lake Avenue North, Worcester, MA 01655, (508) 334-1000. Senior Attending Physician at the Medical Center: likely to have information concerning Dr. Desai's performance.

19. Uy Karl, M.D.

Medical Center, 55 Lake Avenue North, Worcester, MA 01655, (508) 334-1000. Senior Attending Thoracic Surgeon at the Medical Center: likely to have information concerning Dr. Desai's performance.

20. Steven Hatch, M.D.

Medical Center, 55 Lake Avenue North, Worcester, MA 01655, (508) 334-1000. Senior Attending Infectious Disease Physician at the Medical Center: likely to have information concerning Dr. Desai's performance.

21. Edward Smith, M.D.

Medical Center, 55 Lake Avenue North, Worcester, MA 01655, (508) 334-1000. Former Chair of the Department of Radiology: likely to have information concerning Dr. Desai's performance.

22. Dr. Laci McIntosh, D.O.  
Medical Center, 55 Lake Avenue North, Worcester, MA 01655, (508) 334-1000.  
Radiologist in the Department: likely to have information concerning Dr. Desai's performance.
23. Hemang Kotecha, D.O.  
Medical Center, 55 Lake Avenue North, Worcester, MA 01655, (508) 334-1000.  
Radiologist in the Department: likely to have information concerning Dr. Desai's performance.
24. Tasneem Lalani, M.D.  
Medical Center, 55 Lake Avenue North, Worcester, MA 01655, (508) 334-1000.  
Radiologist in the Department: likely to have information concerning Dr. Desai's performance.
25. Lawrence Rosenthal, M.D.  
Medical Center, 55 Lake Avenue North, Worcester, MA 01655, (508) 334-1000.  
Cardiologist who performed surgery on Dr. Desai: likely to have information concerning Dr. Desai's disability.
26. Oscar E. Starobin, M.D.  
Medical Center, 55 Lake Avenue North, Worcester, MA 01655, (508) 334-1000.  
Cardiologist who treated Dr. Desai: likely to have information concerning Dr. Desai's disability.
27. Howard Sachs, M.D.  
Medical Center, 55 Lake Avenue North, Worcester, MA 01655, (508) 334-1000.  
Physician at the Medical Center: likely to have information concerning Dr. Desai's performance.
28. Stephen B. Erban, M.D.  
Medical Center, 55 Lake Avenue North, Worcester, MA 01655, (508) 334-1000.  
Physician at the Medical Center: likely to have information concerning Dr. Desai's performance.
29. Aaron Harman, M.D.  
Medical Center, 55 Lake Avenue North, Worcester, MA 01655, (508) 334-1000.  
Radiologist in the Department: likely to have information concerning Dr. Desai's performance; and the pay disparity in the Department.
30. Susan Afonso, M.D.  
Medical Center, 55 Lake Avenue North, Worcester, MA 01655, (508) 334-1000.  
Radiologist in the Department: likely to have information concerning Dr. Desai's performance; and the pay disparity in the Department.
31. Diana Litmanovich, M.D.

c/o Medical Center, 55 Lake Avenue North, Worcester, MA 01655, (508) 334-1000. Physician who performed the review of Dr. Desai's readings: likely to have information concerning that review.

32. Kimberly A. Robinson, M.D.

c/o Medical Center, 55 Lake Avenue North, Worcester, MA 01655, (508) 334-1000. Physician at Marlborough Hospital: Likely to have information regarding Dr. Desai's performance and her purported complaint to Dr. Rosen concerning the quality of Dr. Desai's work.

33. Randa Mowloud

c/o Medical Center, 55 Lake Avenue North, Worcester, MA 01655, (508) 334-1000. Senior Administrator at Medical Center: likely to have information concerning the gender, age, race, disability, and national origin based disparate treatment targeted at Dr. Desai; and the pay disparity in the Department.

34. David Kydd, M.D.

Massachusetts (address unknown). Former Chief Resident of Medical Center's Department of Radiology: likely to have information concerning Dr. Desai's performance.

35. William J. Blake, M.D.

Massachusetts (address unknown). Former Colleague of Plaintiff at Holden District Hospital: likely to have information concerning Dr. Desai's performance.

36. David A. Rosenfield, M.D.

c/o Medical Center, 55 Lake Avenue North, Worcester, MA 01655, (508) 334-1000. Former Colleague of Plaintiff at Holden District Hospital: likely to have information concerning Dr. Desai's performance.

37. Sanjay Kamath, M.D.

Connecticut (address unknown). Former Radiologist in the Radiology Department: likely to have information concerning Dr. Desai's performance.

38. Jeffrey A. Leppo, M.D.

Massachusetts (address unknown). Former colleague of Plaintiff in at Medical Center: likely to have information concerning Dr. Desai's performance.

39. Carl J. D'Orsi, M.D.

Georgia (address unknown). Former Vice Chairman of the Radiology Department: likely to have information concerning Dr. Desai's performance.

40. Ricardo A. Rosales, M.D.

Massachusetts (address unknown). Former member of the Radiology Department: likely to have information concerning Dr. Desai's performance.



41. Robert D. Chiulli, M.D.

New Hampshire (address unknown). Former Chief of Radiology at Worcester City Hospital: likely to have information concerning Dr. Desai's performance.

42. Daniel Berman, M.D.

c/o Medical Center, 55 Lake Avenue North, Worcester, MA 01655, (508) 334-1000. Member of the Radiology Department: likely to have information concerning Dr. Desai's performance.

43. Andrew Chen, M.D.

c/o University of Massachusetts Medical School, 55 N Lake Ave, Worcester, MA 01655. Assistant Professor of Neuroradiology at the Medical School: likely to have information concerning Dr. Desai's performance.

44. A. Alan Conlan, M.D.

c/o University of Massachusetts Medical School, 55 N Lake Ave, Worcester, MA 01655. Former Professor and Chairman of Thoracic Surgery at Medical School: likely to have information concerning Dr. Desai's performance.

45. Members of the Medical Center's Department of Radiology not mentioned above. Members of Marlborough Hospital's Department of Radiology not mentioned above.

### **INTERROGATORY NO. 3**

State the name, web address, and user name for all Social Media websites that you currently belong to and/or belonged to any time from January 1, 2012, through the present date.

### **ANSWER NO. 3**

Plaintiff objects to this Interrogatory as overly broad, unduly burdensome, and not reasonably related to any claim or defense in this matter as it seeks information about Social Media accounts and/or websites that contain information unrelated to this proceeding. Subject to and without waiving the above objection, Dr. Desai does not currently belong to nor has she in the past belonged to any Social Media websites.

### **INTERROGATORY NO. 4**

Please identify all communications of any kind or nature that you have had with UMass Memorial or any person, except those protected by the attorney-client privilege, regarding your allegations that UMass Memorial, Dr. Rosen, Dr. Dill, Dr. Tosi, and/or Dr. Brennan discriminated against you, including with respect to compensation.

### **ANSWER NO. 4**

Plaintiff objects to this Interrogatory as overly broad, unduly burdensome, and unrelated to the claims or defenses in this matter. This matter has been reported on by the local newspaper

Signed under the penalties of perjury, this 5th day of June, 2020.

/s/ Charu Desai  
CHARU DESAI

AS TO OBJECTIONS:

CHARU DESAI  
By her attorneys,

/s/ Patricia A. Washienko  
PATRICIA A. WASHIENKO (BBO 641615)  
[pwashienko@fwlawboston.com](mailto:pwashienko@fwlawboston.com)  
BRENDAN T. SWEENEY (BBO 703992)  
[bsweeney@fwlawboston.com](mailto:bsweeney@fwlawboston.com)  
FREIBERGER & WASHIENKO, LLC  
211 Congress Street, Suite 720  
Boston, Massachusetts 02110  
Telephone: 617-723-0008  
Fax: 617-723-0009

Dated: June 5, 2020

**CERTIFICATE OF SERVICE**

I hereby certify that on June 5, 2020 Plaintiff Charu Desai's Answers To Defendant UMass Memorial Medical Center Inc.'s First Set Of Interrogatories was served by electronic mail only to counsel for the above named Defendants:

Robert L. Kilroy, Esq.  
Mirick, O'Connell, DeMallie & Lougee, LLP  
1800 West Park Drive, Suite 400  
Westborough, MA 01581-3926  
(508) 860-1477  
rkilroy@mirickoconnell.com

Mark Johnson, Esq.  
University of Massachusetts Office of the General Counsel  
333 South Street, 4th Floor  
Shrewsbury, MA 01545  
(617) 287-4064  
MAJohnson@umassp.edu

/s/ Patricia A. Washienko  
Patricia A. Washienko

**EXHIBIT D**

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# MIRICK O'CONNELL

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A T T O R N E Y S   A T   L A W

**Reid M. Wakefield**  
Mirick O'Connell  
1800 West Park Drive, Suite 400  
Westborough, MA 01581-3926  
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t 508.768.0730  
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March 20, 2020

Patricia A. Washienko, Esq.  
Brian T. Sweeney, Esq.  
Frieberger & Washienko, LLC  
221 Congress Street, Suite 720  
Boston, MA 02110

Re: Charu Desai v. UMass Memorial Medical Center, Inc, et al.  
USDC Civil Action No.: 4:19-CV-10520-DHH

Dear Attorneys Washienko and Sweeney:

Enclosed please find a CD containing documents produced by UMass Memorial Medical Center as part of its initial disclosures Bates Stamped UMM 00001 through UMM 00705 regarding the above-referenced matter.

Very truly yours,

  
Reid M. Wakefield

RMW/ljg  
Enclosure

cc: Denise A. Barton, Esq. and Mark A. Johnson, Esq. (first class mail, w/enclosure)  
Robert L. Kilroy, Esq. (via email, w/o enclosure)

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**MIRICK, O'CONNELL, DEMALLIE & LOUGEE, LLP**

WORCESTER | WESTBOROUGH | BOSTON

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